

July 27, 2000

SENT VIA E-MAIL AND U.S. MAIL

Stacey L. Parker  
Counsel, Director of Regulatory Affairs  
MediaOne Telecommunications of Massachusetts, Inc.  
6 Campanelli Drive  
Andover, MA 01810

Re: D.T.E. 99-271

Dear Ms. Parker:

Enclosed please find questions to MediaOne Telecommunications of Massachusetts, Inc. ("MediaOne") issued by the Department based upon MediaOne's July 18, 2000, filing in D.T.E. 99-271. Please submit MediaOne's responses to the Department and the participants in hard copy and by e-mail on or before **5:00 p.m. Thursday, August 3, 2000**. Should you have any questions please contact either Cathy Carpino at (617)305-3622 or Tina Chin at (617)305-3578.

Sincerely,

Cathy Carpino  
Hearing Officer

Tina Chin  
Hearing Officer

Enc.

cc: DTE 99-271 Service List (w/enc.)

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

QUESTIONS TO MEDIAONE TELECOMMUNICATIONS  
OF MASSACHUSETTS, INC.  
D.T.E. 99-271

The Department of Telecommunications and Energy ("Department") submits to MediaOne the following Questions.

**Instructions**

The following instructions apply to this set of Questions and all subsequent Questions issued by the Department to MediaOne in this proceeding.

1. Each request should be answered in writing on a separate three-hole punched page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Please do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if MediaOne or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:  
  
Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If MediaOne finds that any one of these questions is ambiguous, please notify the

hearing officers so that the question may be clarified prior to the preparation of a written response.

7. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department; two (2) copies for each hearing officer; and one (1) copy to each member of the participants' service list, including the Department's telecom analysts.

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

DEPARTMENT QUESTIONS TO MEDIAONE TELECOMMUNICATIONS OF  
MASSACHUSETTS, INC.  
D.T.E. 99-271

1. [Checklist Item 1] See MediaOne Supplemental Comments. Provide documentation to support the following claims:
  - a) p. 5: "MediaOne, however, did not submit the new design with the intent of forcing BA to adhere to it, but presented it as an alternative to the existing plan..."
  - b) p. 5: "One BA notified MediaOne that it could not proceed forward with the revised plan, MediaOne immediately withdrew the plan and returned to the original interconnection design."
  - c) p. 5: "The delay caused by the revised proposal was, at most, one month..."
2. [Checklist Item 11] See MediaOne Supplemental Comments at 10. Provide documentation the following claims:
  - a) "...MediaOne communicates these requests in accordance with BA's procedures."
  - b) "Over the past four months, BA erroneously ported approximately 4% of ports they had confirmed to MediaOne as cancelled or rescheduled (including a 7% defect rate in the month of June."